

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

HAMAN, INC. d/b/a KNIGHTS INN,)	
)	
Plaintiff,)	
)	
)	Civil Action File No.
)	<u>2:18-cv-1534-KOB</u>
)	
v.)	
)	
CHUBB CUSTOM INSURANCE)	
COMPANY,)	
Defendant.)	

**NOTICE OF FILING OF EVIDENTIARY MATERIALS IN SUPPORT OF
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

COMES NOW Plaintiff Haman, Inc. d/b/a Knights Inn, and pursuant to this Court's Initial Order (Doc. 12), submits the following evidentiary materials:

DOCUMENTS

Exhibit 1 -	Insurance Policy – 03/02/14
Exhibit 2 -	Chubb record of payments document
Exhibit 3 -	Proof of Loss – Fire – Structure - 04/08/2016
Exhibit 3A -	Howarth Group appraisal estimate – Fire- 2/11/2015 (225 pages)
Exhibit 4 -	Proof of Loss – Fire contents – 09/30/2014

- Exhibit 4A - Howarth Group Appraisal estimate- Fire contents – \$139,451.32 (43 pages)
- Exhibit 5 - Proof of Loss – Wind Claim – 04/08/2016
- Exhibit 6 - Howarth Group Appraisal Estimate – wind claim– 01/10/2016 (52 pages) \$1,595,608.00
- Exhibit 7 - Contents Itemization – wind claim (41 pages) - \$138,082.14
- Exhibit 8 - Common Area Estimate – wind claim (5 pages) – \$56,850.93
- Exhibit 9 - Chart of All Haman Estimates, All Payments Made
- Exhibit 10 - Appraisal Demand – fire – 02/25/2015
- Exhibit 11 - Appraisal demand Chuck Howarth to Wilburn (wind claim) 07/06/2015
- Exhibit 12 - Cover letter of 08/20/2015 for Declaration of Appraisers
- Exhibit 13 - Declaration of Appraisers – both claims (signed by Bushman & Howarth)
- Exhibit 14 - Perich to Howarth email 07/22/2015 (RE: Bushman’s appraiser)
- Exhibit 15 - Umpire Acceptance (02/01/2016)
- Exhibit 16 - Deposition of Chuck Howarth
- Exhibit 16A - Chuck Howarth CV
- Exhibit 17 - Deposition of Arthur Grandinetti
- Exhibit 17A - Arthur Grandinetti CV
- Exhibit 18 - Deposition of Tom Irmeter

Exhibit 18A - Tom Irmiter Report

Exhibit 18B - Tom Irmiter CV

Exhibit 19 - Deposition of Wade Bushman

Exhibit 20 - Bushman to Howarth – accepting Mullin as umpire – 07/23/2015

Exhibit 21 - 08/08/2019 Letter – Leslie Davidson RE: Bushman document dump

Exhibit 22 - Deposition of Brent Perich

Exhibit 23 - Email from Brent Perich to Wade Bushman re: Helm’s Report

Exhibit 24 - Email – Brent Perich to Wade Bushman

Exhibit 25 - 1st EUO of Chuck Howarth – 09/26/2017

Exhibit 26 - 2nd EUO of Chuck Howarth – 12/12/2017

Exhibit 27 - EUO of Haman (Mrs. Zarin Visram) – 09/26/2017

Exhibit 28 - Perich to Howarth Email 04/04/2015 (confirming inspection and appraisal rights if not satisfied)

Exhibit 28A- Alabama Department of Insurance – Appraisal advice

Exhibit 29 - Deposition of Sheila Allen

Exhibit 29A - Chubb internal document, business interruption loss

Exhibit 30 - Dale Mullin CV

Exhibit 31 - Deposition of Kurt Mulder

Exhibit 32 - Deposition of Randy Wilburn

- Exhibit 32A- Deposition document re: Alabama Law – Wilburn file
- Exhibit 32B - Conchin letter to Wilburn, November 30, 2015
- Exhibit 33- Insurance Evaluation – Chubb- two weeks before fire, six weeks before storm
- Exhibit 34- Insurance Valuation Report 5-6-2015 - York

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of August, 2020 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following: Wayne D. Taylor, Michelle A. Sherman, Mark D. Hess and David R. Wells, and I certify that I have e-mailed and mailed by United States Postal Service the document to the following non-CM/ECF participants:

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